

Appendix A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

DIVISION

Stacie Ann Shakir; Maiden: Stacie Ann Rudd

versus

Wood Partners LLC.

8 Greenway Plaza Suite 600

Houston, Texas 77046

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§
§

CIVIL ACTION NO. _____

EMPLOYMENT DISCRIMINATION COMPLAINT

1. This action is brought under Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is conferred by Title 42 United States Code, Section § 2000e-5.

2. The Plaintiff is:

Stacie Ann Shakir

Address:

2034 Declaration Drive

Missouri City, Texas 77459

County of Residence:

Fort Bend County

3. The defendant is:

Wood Partners LLC.

Address:

8 Greenway Plaza Suite 600

Houston, Texas 77046

☐ Check here if there are additional defendants. List them on a separate sheet of paper with their complete addresses.

4. The plaintiff has attached to this complaint a copy of the charges filed on June 18, 2014 with the Equal Opportunity Commission.

5. On the date of 7/17/14, the plaintiff received a Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission; a copy is attached.

6. Because of the plaintiff's:

- (a) ☒ race
- (b) ☐ color
- (c) ☐ sex
- (d) ☒ religion
- (e) ☐ national origin,

the defendant has:

- (a) ☒ failed to employ the plaintiff
- (b) ☐ terminated the plaintiff's employment
- (c) ☐ failed to promote the plaintiff
- (d) ☒ other: **Conspiracy to deliberately Sabotage Stacie Ann Shakir's employment due to non job related personal interest. Defamation of character to staffing agency, Attempted Character and Job Performance assassination, dishonest employment practices, Retaliation section 21.055 Penal Code, Created a Hostile Work Environment, wrongful termination.**

7. When and how the defendant has discriminated against the plaintiff:
Religion, Section 21.108, on On 04/01/2014~ Ana Wade made a comment about her illegal smoking eluding to and intentionally making fun of my religious beliefs. On 04/03/2014, a male working in that office that I believe was homosexual stated to Michelle Ticer (in which she laughed condoning his comment) in a loud voice " This is why I don't like Jesus Christ". Sec. 21.056. AIDING OR ABETTING DISCRIMINATION & Section 21.108 Discrimination based upon Religion, 21.055. RETALIATION, After the April 6, 2014 comment that I was recording was told not to contact Andrea Vanderbilt out of fear they were recorded in order to prevent me from charging them with discrimination. Sec. 21.051. DISCRIMINATION BY EMPLOYER, this is pertaining to my race and my and my color, non of the people involved were of my color, race, or religion.

8. The plaintiff requests that the defendant be ordered:

- (a) ☒ to stop discriminating against the plaintiff
- (b) ☐ to employ the plaintiff
- (c) ☐ to re-employ the plaintiff
- (d) ☐ to promote the plaintiff

(e) ☒ to

be ordered to pay 2 years of salary in the amount of \$ 62,400.00, to ensure the future success of my future employment without interruption, due to this defendant Wood Partners LLC. or its associates and affiliates in any way knowingly or unknowingly defame my character or slander me in any form to any past or present or future employers to have me falsely terminated, also to avoid and finalize the failure of their comment and belief of "We will make sure Stacie will never work in this town again". Punitive damages to ensure the defendant understands the magnitude of their actions and to ensure the defendant is mindful of discrimination. I ask the court to determine the punitive damage amount. To also order a permanent restraining order to Wood Partners LLC. and ANY Affiliates and Associates. and that;

(f) ☒ the Court grant other relief, including injunctions, damages, costs and attorney's fees.


(Signature of Plaintiff)

Address: 2034 Declaration Drive
Missouri City, Texas 77459
Telephone: (832) 729-2104

EEOC Form 16* (11/09)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Stacie A. Shakir**
2034 Declaration Drive
Missouri City, TX 77459

From: **Houston District Office**
Total Plaza
1201 Louisiana, Suite 600
Houston, TX 77002

☐

On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

460-2014-03066

Ryan Mays,
Investigator

(713) 651-4948**THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:**☐

The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.

☐

Your allegations did not involve a disability as defined by the Americans With Disabilities Act.

☐

The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.

☐

Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge

☒

The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.

☐

The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.

☐

Other (briefly state)

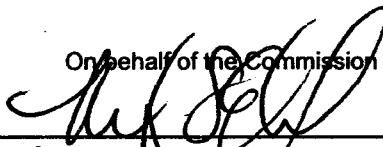
- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission


R.J. Ruff, Jr.,
District Director
JUL 17 2014

Enclosures(s)

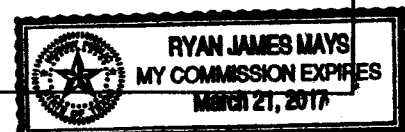
(Date Mailed)

cc: **Ryan L. Dearborn**
Director, Chairman/CEO
WOOD PARTNERS, L.L.C.
8 Greenway Plaza, Suite 600
Houston, TX 77046

Lowell Keig, Executive Director
TWC/ CIVIL RIGHTS DIVISION
101 East 15th Street, Room 144T
Austin, Texas 78778

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented To: Agency(ies) Charge No(s): <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC 460-2014-03066	
Texas Workforce Commission Civil Rights Division and EEOC <small>State or local Agency, if any</small>			
Name (indicate Mr., Ms., Mrs.) Ms. Stacie A. Shakir		Home Phone (Incl. Area Code) (832) 729-2104	Date of Birth 10-28-1980
Street Address City, State and ZIP Code 2034 Declariation Drive, Missouri City, TX 77459			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name WOOD PARTNERS, L.L.C.		No. Employees, Members 15 - 100	Phone No. (Include Area Code) (713) 439-7900
Street Address City, State and ZIP Code 8 Greenway Plaza, Suite 600, Houston, TX 77046			
Name		No. Employees, Members	Phone No. (Include Area Code)
Street Address City, State and ZIP Code			
DISCRIMINATION BASED ON (Check appropriate box(es).) <input checked="" type="checkbox"/> RACE <input checked="" type="checkbox"/> COLOR <input type="checkbox"/> SEX <input checked="" type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)			DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest 03-11-2014 04-08-2014 <input type="checkbox"/> CONTINUING ACTION
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): <div style="text-align: center; font-size: 1.2em; font-weight: bold; margin-top: 20px;">PLEASE SEE ATTACHED</div>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures. I declare under penalty of perjury that the above is true and correct.		NOTARY - When necessary for State and Local Agency Requirements <div style="text-align: center; margin-top: 10px;"> </div> I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT <div style="text-align: center; margin-top: 10px;"> </div> SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year) <div style="text-align: center; margin-top: 10px;"> </div>	
Jul 07, 2014 Date Charging Party Signature		July 7, 2014	



**INFORMATION RELATED TO FILING SUIT
UNDER THE LAWS ENFORCED BY THE EEOC**

*(This information relates to filing suit in Federal or State court under Federal law.
If you also plan to sue claiming violations of State law, please be aware that time limits and other
provisions of State law may be shorter or more limited than those described below.)*

**PRIVATE SUIT RIGHTS -- Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA),
the Genetic Information Nondiscrimination Act (GINA), or the Age
Discrimination in Employment Act (ADEA):**

In order to pursue this matter further, you must file a lawsuit against the respondent(s) named in the charge **within 90 days of the date you receive this Notice**. Therefore, you should **keep a record of this date**. Once this 90-day period is over, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and its envelope, and tell him or her the date you received it. Furthermore, in order to avoid any question that you did not act in a timely manner, it is prudent that your suit be filed **within 90 days of the date this Notice was mailed to you** (as indicated where the Notice is signed) or the date of the postmark, if later.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. (Usually, the appropriate State court is the general civil trial court.) Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. Filing this Notice is not enough. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Your suit may include any matter alleged in the charge or, to the extent permitted by court decisions, matters like or related to the matters alleged in the charge. Generally, suits are brought in the State where the alleged unlawful practice occurred, but in some cases can be brought where relevant employment records are kept, where the employment would have been, or where the respondent has its main office. If you have simple questions, you usually can get answers from the office of the clerk of the court where you are bringing suit, but do not expect that office to write your complaint or make legal strategy decisions for you.

PRIVATE SUIT RIGHTS -- Equal Pay Act (EPA):

EPA suits must be filed in court within 2 years (3 years for willful violations) of the alleged EPA underpayment: back pay due for violations that occurred **more than 2 years (3 years) before you file suit** may not be collectible. For example, if you were underpaid under the EPA for work performed from 7/1/08 to 12/1/08, you should file suit **before 7/1/10 – not 12/1/10** – in order to recover unpaid wages due for July 2008. This time limit for filing an EPA suit is separate from the 90-day filing period under Title VII, the ADA, GINA or the ADEA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA or the ADEA, in addition to suing on the EPA claim, suit must be filed within 90 days of this Notice and within the 2- or 3-year EPA back pay recovery period.

ATTORNEY REPRESENTATION -- Title VII, the ADA or GINA:

If you cannot afford or have been unable to obtain a lawyer to represent you, the U.S. District Court having jurisdiction in your case may, in limited circumstances, assist you in obtaining a lawyer. Requests for such assistance must be made to the U.S. District Court in the form and manner it requires (you should be prepared to explain in detail your efforts to retain an attorney). Requests should be made well before the end of the 90-day period mentioned above, because such requests do not relieve you of the requirement to bring suit within 90 days.

ATTORNEY REFERRAL AND EEOC ASSISTANCE -- All Statutes:

You may contact the EEOC representative shown on your Notice if you need help in finding a lawyer or if you have any questions about your legal rights, including advice on which U.S. District Court can hear your case. If you need to inspect or obtain a copy of information in EEOC's file on the charge, please request it promptly in writing and provide your charge number (as shown on your Notice). While EEOC destroys charge files after a certain time, all charge files are kept for at least 6 months after our last action on the case. Therefore, if you file suit and want to review the charge file, **please make your review request within 6 months of this Notice**. (Before filing suit, any request should be made within the next 90 days.)

IF YOU FILE SUIT, PLEASE SEND A COPY OF YOUR COURT COMPLAINT TO THIS OFFICE.

To the United States Department of the Equal Employment Opportunity Commission

Claimant: Stacie Ann Shakir
2034 Declaration Drive
Missouri City, Texas 77459
(Position given in this employer's agency: Assistant Administrator)

Defendant: Wood Partners, L.L.C.
8 Greenway Plaza, Suite 600
Houston, Texas 77046

and

Frontline Source Group
2901 W. Sam Houston Parkway N, Suite B-215
Houston, TX 77043

(Total number of 15 to 16 employees inside Wood Partners)

Reason for Termination: Not a fit for the company & Contract was up
(This was not the initial reason as given on the

telephone)

Defendant being Charged with: Discrimination Based upon Race, Color, Religion
Retaliation
Wrongful Termination
Conspiracy to deliberately Sabotage Stacie Ann Shakir's
employment due to personal interest
Harassment
Character and Job Performance assassination
Deceitful Employment Practices
Defamation of Character
Dishonest Employee
Hostile Work Environment
Misrepresentation of a job promotion and job description
False Testimony due to personal interest

To the officer of the EEOC Sir/Maam,

Jim Murray agency was not the only employer that tried these desepptive employer practices through a staffing agency.

On March 7, 2014, I interviewed with Michelle Ticer, the office administrator at Wood Partners, LLC. She seemed frantic as if things were out of control in her office as she spoke to me. She stated:

1. We are needing assistance with our office paperwork.
2. Alot of paperwork had been tampered with and removed out of their office computer.
3. I am looking for someone that can put all of the information back into the system and help to reorganize office files and ensure all documents are in office files.
4. I am in over my head and I need assistance.
5. Even though I am a believer in God, I sometimes curse or do things such as that.

6. Some of the guys here in the office say tasteless things and might say some things that may be offensive.

I stated to her my credentials and also:

1. I was told that this was a contract for 30 days and that I was looking for something on a more permanent basis.

She stated:

1. If things actually work out, I am going to need an assistant anyway.
2. The last person that I interviewed did not contact us back (Ana Wade) whom was also a employee of Frontline Source Group so if things work out, you could possibly be hired on permanently.
3. If another position happens to come your way, I would have no problem with ending the contract and allowing you to go for that permanent position.

I stated to her:

1. I would be more than happy to accept the position and assist with organization and other duties assigned.
2. About the tasteless jokes, I would just ignore if it happens. I am a strong believer in God and would not participate in any tasteless thing.

I began working at wood partners on March 11, 2014 and immediately went into my job duties. I caught on to all of the task and began organizing some of the paperwork. Michelle Ticer, was very impressed at the organization in such a short time. The whole week Michelle and I worked great and everything was neatly and appropriately in its correct order, and ready to be scanned and filed away.

On March 17, 2014, the employee that never contacted them back, came to work. That seemed very odd to me considering she didnt call back. I was moved to another desk with a old and completely slow processing system that made it very frustrating while waiting for the computer to upload documents. This computer was also not attached to the printer, so I had to go to the other computer while Ana Wade, was sitting there in order to file a scan.

On March 21, 2014, I contacted Melissa Wood whom I was told to ask about tech support, and was told I know the computer is slow and frustrating, but we have a new computer coming, with all the necessary tools. I was given non of the tools neccessary to effectively complete my task, but managed to get my task complete utilizing the down time. I would file and organize when the computer was going slow, and I would organize other documents that needed to go into the file. After organizing the documents, I was then able to verify what paperwork was missing and needed from the clients. I began receiving calls from Andrea Vanderbilt about documents that were missing from the computer spreadsheet.

Andrea Vanderbilt was the Office Manager. She would email request to me and I would also email her with the conclusion and completion. I spoke with her on numerous occasions in the office pertaining to missing documents and I was successfully retrieving all the neccessary documents needed in order to send payments to their clients. I was doing this at a high rate of speed and was even commended from Andrea Vanderbilt via email about how fast the documents were coming in and going into the right place. Michelle Ticer stated to me on March 25, 2014 that she had been in talks with her manager and wanted to bring me on full time because of the wonderful job that I had done. I began doing some of her extra assignments while waiting for other documents to come in from clients. I thought about it, and stated to her, no problem as long as I can be notified of the salary. I made it a point to remain quiet and to complete my task.

During the whole time, from March 17, 2014 to my last day of employment, Ana Wade was very

rude to customers when they would call, and did not know her job responsibilities. She began making sly comments pertaining to the clients and other matters she believed to be pertaining to myself. I just continued to ignore her and complete my task.

She would say aloud:

1. "Lady why are you calling me about these payments!"
2. "I just started working here, I don't know the answer."

She would just respond after every phone call out loud once she got off of the phone about every phone call. She was very unprofessional and at times made it very irritable at work. I made sure that I maintained my professionalism and conducted myself in a professional manner and would not respond or laugh.

When Andrea Vanderbilt went to a meeting out of town on April 1, 2014, Ana Wade's antics became worst, and so did Michelle Ticer's.

1. "I just want to let you all know that I used to smoke weed."

She stated this pertaining to my religious beliefs of not doing that and my comment about tasteless jokes. In other words, she was implying Stacie is holler than she is, and tried to make fun of my integrity and honesty, and the way that I came to work doing my job instead of doing what they were doing, When she realized I wasn't responding to her antics or laughing as Michelle was.

I looked up from my computer in amazement. Michelle Ticer was there during all of her antics and at times laughed and egged her on. When she hung up on the client, Michelle Ticer, smirked and did not reprimand her and did not write her up. I stated out loud that I was going to begin recording her. She immediately became quiet and so did Michelle Ticer.

While Andrea Vanderbilt was out of town, she would call me on the new office phone that I had just received and request updates to the waivers and other documents needed in order to send payment to the clients. I would call her back, as instructed and email her as instructed as I always did when she was in the office. Michelle Ticer, heard Andrea calling me throughout my employment there and also saw Andrea was emailing me throughout my employment there, so there was no surprise to Michelle Ticer that Andrea and I were communicating about office task she assigned.

On April 8, 2014, after receiving an email and status update request from Andrea Vanderbilt while she was still out of town but returning on the next day, I responded to her email advising her that the waivers she previously requested status on was in the system for her review. I also requested to have a meeting with her upon her return in order to obtain a letter of recommendation for my next employer. At this point, I no longer wanted to work for Wood Partners LLC and the contract was almost up.

I was approached by Michelle Ticer after I sent that email, and she stated in a very fearful way:

1. Did you email Andrea Vanderbilt?

I stated to her:

1. Yes. I followed up her request for updated waivers that were added into the system as usual.

She stated in a very frantic and fearful way:

1. From now on, let Ana Wade speak to Andrea about any updates.

an EEOC officer that I could have recorded without notifying them.

I exercised my power to work in a harrassment free working environment, and I exercised my right to obtain a letter of recommendation considering all of the hard work I completed. I did not receive anything I requested. This was deliberate and a statement needs to go to employers such as this that tolerance for these types of hostile working environments and attempts to cancel the employment of a person because the person does not participate in their antics, or discrimination, or retaliation, cannot be tolerated. People should work in a secure working environment and not based upon someone's personal vindetta and hidden hatred for one's color, race, or religious beliefs.

I am asking the EEOC to investigate Wood Partners LLC. and Frontline Source Group of discrimination and retaliation.

If the EEOC does not investigate, I would need a right to sue letter, and I will also contact the head of the EEOC about this as well along with the other charge to the other employer who tried to do the same thing.

Thank you,

Stacie Shakir 7/7/14
Stacie Ann Shakir



Ryan J. Mays
July 7, 2014